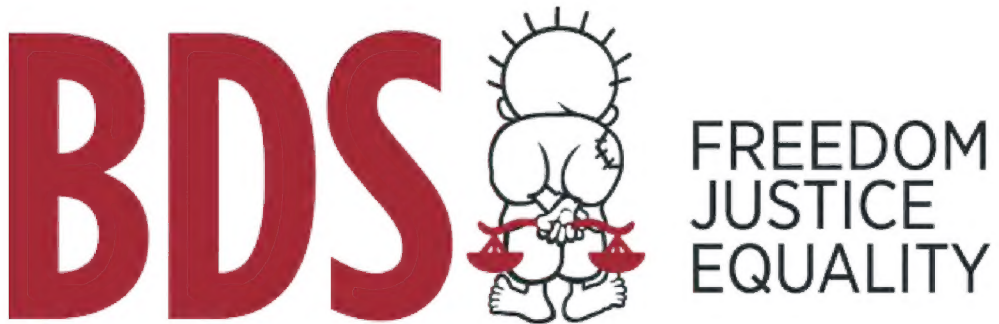


@newpaltzstudentsforpalestine

# WHERE DOES YOUR MONEY GO?

## FOIL DEMONSTRATION TOOLKIT AND BDS RESEARCH GUIDE



# iNTRODUCTION

The “Call to Action: FOIL Submission Campaign” section of this guide will teach you how to submit a FOIL request about a BDS target company suspected of business dealings with SUNY New Paltz.

The “Independent Research” section will provide a selection of BDS research resources and approaches that worked for us.

The guide emerged from three months’ worth of BDS research by a team of New Paltz students. As people with no expertise in institutional research, we were able to uncover a handful of contracts with target companies. You can do everything we describe here with some time and an internet connection.

We call upon the SUNY New Paltz community to show the institution that we are paying attention. Submit A FOIL request about a target company. Browse the culpable company databases.

New Paltz, get your hands dirty.



Richard Winters, c. 2003

# WHAT IS BDS?

BDS is a Palestinian-led movement that aims to put financial pressure on Israel and to call attention to the human rights violations that Palestinians face. BDS stands for Boycott, Divest, and Sanction.

**Boycotts** involve individuals (not companies) withdrawing support from Israel and any entities that support Israel economically, culturally, or politically.

**Divestment** involves institutions (not individuals) withdrawing support from Israel, Israeli companies, and any other companies that support Israel. It's the opposite of investment.

**Sanctions** involve ending all business with Israel, including military support and trade agreements, and withdrawing Israeli membership in public bodies such as the United Nations.

Reference: What is BDS?

<https://bdsmovement.net/what-is-bds>

# CALL TO ACTION: BDS FOIL SUBMISSION CAMPAIGN

## WHAT IS A FOIL?

FOIL stands for Freedom of Information Law. This act allows citizens to access records from public agencies like courts, government departments and, in our case, universities.

## HOW DO I PARTICIPATE?

It's easy!

STEP 1: Email or Call

[wintersr@newpaltz.edu](mailto:wintersr@newpaltz.edu)

(845) 257-3291

STEP 2: Pick a BDS Target company that New Paltz might have contracts with. You can pick from our list of suggestions.

STEP 3: Write your script. Below is a sample email:

## WHAT IS THIS CAMPAIGN?

Information about SUNY New Paltz's investments and contracts is public knowledge and should be accessible to everyone.

Submitting a FOIL request shows that we are paying attention to how our money is spent. Richard Winters processes FOIL requests for New Paltz. Flood his inbox with requests about BDS targets until the university has no choice but to acknowledge our demands for transparency.



Richard Winters, c. 2008

# SAMPLE SCRIPT

Re: Freedom of Information Law Request

Dear Records Access Officer:

Under the provisions of the New York Freedom of Information Law, Article 6 of the Public Officers Law, I am asking to see documentation of New Paltz's business dealings with (target company) including any contracts, investments, or charitable donations.

If my request appears to be extensive or fails to reasonably describe the records, please contact me in writing or by phone at (number or email)

If there are any fees for copying the records requested, please inform me before filling the request.

As you know, the Freedom of Information Law requires that an agency respond to a request within five business days of receipt of a request. Therefore, I would appreciate a response as soon as possible and look forward to hearing from you shortly.

If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name and address of the person or body to whom an appeal should be directed.

Sincerely,

Signature

# SOME COMPANIES TO EMAIL ABOUT

source: Who Profits Research Center

- **Ford:** Manufactures armored vehicles used by the Israeli military in the occupied West Bank and in the besieged Gaza.
- **IBM:** Complicit in Israel's Military-Industrial Complex, and in providing services, equipment and technology to Israeli settlements and Israel Police.
- **Dell:** Provides maintenance services and related equipment to the Israeli military. These services were funded by US foreign aid provided by the United States to Israel.
- **HP:** Supplies biometric ID cards to checkpoints that are used to surveil Palestinians entering and leaving occupied territory.
- **BAE systems:** Provides the targeting displays in F-16 fighter jets, which Israel used extensively in its attack on Gaza in 2014, killing over 1400 Palestinian civilians, a third of them children.”(BDS)
- **Microsoft:** Provides services to the Israeli government, the Israeli Ministry of Defense (IMOD) and providing cloud services to the Israeli military and security bodies in Israel.

- **Lockheed Martin:** “Lockheed Martin is proud of the significant role it has fulfilled in the security of the State of Israel. Our C-130 and F-16 aircraft have been faithfully serving the Israel Air Force since the 1970s and 1980s, and when a Letter of Agreement was signed in October 2010, Israel became the first country to select the F-35 through the United States government's Foreign Military Sales process.”(lockheedmartin.com)
- **Cisco:** Involved in setting up technological hubs on occupied land, expanding visual surveillance in Jerusalem and delivering IT services to the Israeli military. Webex, the platform New Paltz uses for virtual meetings, is a subsidiary of Cisco.
- **Mitsubishi:** A heavy machinery manufacturer who's equipment has been widely used in the destruction of Palestinian homes.
- **General Electric:** Manufactures weapons and power plants for Israel.
- **Chevron:** Holds a subsidiary called Noble Gas which extracts oil in the occupied Gaza strip, enriching Israel off the resources of Palestinian lands.
- **Canon:** Produces video security equipment used in the surveillance of Palestinian people.



Richard Winters c. 2008

# **iNDEPENDENT RESEARCH**

The New Paltz Students for Palestine research team's basic approach was as follows.

First, we scraped as much information as possible about SUNY's business dealings with third-party companies. Some companies do business with the entire SUNY system, while others do business with New Paltz specifically. We focused on New Paltz-specific targets, but we cast a wide net to identify SUNY-wide targets too. This includes contracts, charitable donations, and investments.

Then, we compiled target companies for institutional divestment from various databases named by the Palestinian BDS Commission. Then, we compared New Paltz's business partners to these targets to find matches.

When we knew what target companies New Paltz had business with, we researched the contracts. This involved submitting a detailed, specific FOIL request.

We will outline our process here. Use what is helpful to you, and feel free to diverge as you see fit.

# LOCATING NEW PALTZ'S FINANCIAL INFORMATION

1. **Open Book New York:** This is the Office of the Comptroller state agency database. SUNY contracts are reported to the office of the comptroller and can be viewed through this database.

The screenshot shows the 'NYS Contract Search' form. It includes fields for Agency Name (set to 'State University of New York'), Authority Name (set to 'All State Authorities'), Vendor Name, Contract Number, Contract Type (set to 'All'), Original Contract Approved/Filed Date, Contract Period (End Date set to 'After 04/20/2024'), and Current Contract Amount. A blue arrow points from the 'State University of New York' dropdown to a text box explaining that filtering by individual SUNY is not possible, but the university is specified in the 'department/facility' tab. Another blue arrow points from the '04/20/2024' date field to a text box explaining that the end date should be set to after the day of the search to ensure current results. The form has 'Search' and 'Reset' buttons at the bottom.

**NYS Contract Search**

**Search Criteria**

Agency Name

Authority Name

Vendor Name  ☒ Begins With ☐

Contract Number

Contract Type

Original Contract Approved/Filed Date

Contract Period

Current Contract Amount

It's not possible to filter by individual SUNY, but the university is specified in the "department/facility" tab

Set the end date to after the day of your search to ensure that your results are current!

Here's an example of how your search might look. Results from your search can be downloaded to an Excel spreadsheet for further manipulation and labelling.

This database has some limitations. First, reporting is likely not totally current as state agencies don't have to report constantly to the office of the comptroller. Second, The database is not complete. Contracts we know New Paltz has, such as the contract with Sodexo, do not appear here.

**find the database here:**

<https://wwe2.osc.state.ny.us/transparency/contracts/contractsearch.cfm>

**2. SUNY contracts search:** This is a SUNY-operated webpage which displays a selection of SUNY contracts accompanied by a short description and some details. Like the Open Book database, the results here are also likely incomplete.

**Contract Detail**

IBM - SPSS Technology

Effective: 7/1/2023 Ending: 6/30/2026

**VENDOR**

IBM - SPSS  
Carey Sand  
SPSS Account Manager - Northeast

Phone Ext  
(919) 884-3354

**CONTRACT**

Number: OGS Agreement PM20890  
SUNY Contact  
[Mike Notarius](#)  
CIO  
SUNY ITEC  
Buffalo State College  
1300 Elmwood Ave  
Buffalo, NY 14222 - 1095

Phone Ext  
(716) 878-3185  
Renewal Terms  
No extension

Multiple phone numbers are available for most of these contracts!

**Find here:** <https://www.suny.edu/business/contractsearch/>

Pro tip: the link at the top of the page to the statewide agency search engine is broken. Here's a working link:

<https://ogs.ny.gov/procurement/ogs-centralized-contracts-list>

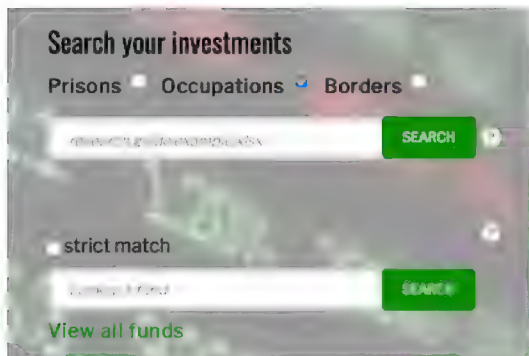
**3. SUNY Annual Financial report:** This document details some of SUNY's financial metrics, including the values of investments and bonds. This document went above the research team's heads, but we thought it could be informative to the business-literate.

**Find it here:** <https://www.suny.edu/media/suny/content-assets/communication/publicationsreportsdata/2023-Annual-Financial-Report.pdf>

# BDS TARGET DATABASES

All these databases are named On the Palestinian BDS Committee website as “authoritative sources” for the identification of institutional divestment and exclusion targets.

1. **Investigate.afsc.org:** A project of the American Friends Service Committee. This website is a great place to start. You can upload a file of companies (.pdf, .xls, etc.), and *Investigate* cross-checks the companies in your file with divestment targets in the American Friends Service Committee database. In the following example, we uploaded an Excel spreadsheet downloaded from the office of the comptroller website.



Pane where files are uploaded

## DISPLAYING RESULTS IN *RESEARCH.GUIDE.EXAMPLE.XLSX*

Total companies found : 9

Download our Data View all matches Scan another document

Including the following 2 companies we recommend for divestment:

- Chevron Corp
- General Electric Co

ABB  
Switzerland  
view all 1 match

A Swedish-Swiss multinational corporation that manufactures robotics, electrification equipment, and automation technology. Its equipment has been used at solar energy fields in the occupied West Bank.

Occupations

Canon  
Japan  
view all 3 matches

A Japanese manufacturer of cameras and film equipment. Its subsidiary Briccam provides video surveillance tools to the Israeli occupation authorities in East Jerusalem.

Occupations

Chevron  
USA  
view all 2 matches

One of the world's largest oil and gas companies. Its subsidiary Noble Energy extracts gas off the shores of the Gaza Strip, exacerbating the Gaza blockade and potentially involved in pillaging.

Occupations

Some of the cross-check results. Remember to double-check each match: In this case, the first match (ABB) is an error.

Original document text and pagination

1

CANISIUS UNIVERSITY OF BUFFALO NEW YORK SUNY at Buffalo X001009  
\$163,843.11 \$0.00 01/01/2006 12/31/2026 REVENUE - ALLOCATE (2) SINGLE  
MODE FIBER OPTIC STRANDS TO CANISIUS COLLEGE Revenue Generating - Other  
02/09/2006

CANON MEDICAL SYSTEMS USA INC SUNY at Stony Brook C011397 \$924,563.00  
\$751,677.37 11/01/2019 10/31/2024 Maintenance services for Canon  
Aquilion One CT Scanner Equipment - Medical 01/27/2021

← back to results

- ABB Ltd
- Canon Inc
- Chevron Corp
- Cisco Systems Inc
- Ford Motor Co
- General Electric Co

Screenshot of the “view all matches” function. *Investigate* highlights target companies in the original document in green, and displays them on the right-hand sidebar.

2. **Whoprofits.org**: Unlike *Investigate*, this database is dedicated entirely to companies culpable for the Israeli occupation. The database includes a thorough writeup of every target company, and a button to easily export all data to Excel. Target company profiles also include a list of subsidiaries, partner companies, and major shareholders.

3. **Don't Buy Into Occupation Coalition reports**: This resource is the yearly reporting of an international coalition which "aims to investigate and highlight the financial relationships" between businesses invested in the occupation and European financial institutions. The report names culpable companies and banks which do business with those companies.

Find the latest report here:

<https://tinyurl.com/dontbuyintooccupation2023>

4. **United Nations Human Rights Council Database**: This is a straightforward database of companies found by a United Nations investigation to be involved in the operation of the Israeli settlements via supply of surveillance, supply of equipment, banking, and other dealings.

Find it here: <https://tinyurl.com/UNinvolvedcompanies>

# LOCATING BDS TARGETS AT SUNY NEW PALTZ

Once you've explored New Paltz's business connections and have some familiarity with institutional BDS targets, your approach is up to you!

Excel was our most-used tool for comparing SUNY and BDS databases to find our targets. Our two most used Excel functions were **filter**, for searching individual companies, and **conditional formatting**, for making comparisons between two columns.

You may also find yourself looking for information which is not available online. The legitimate institutional channel for securing public information is the FOIL request.

You should submit FOIL requests as due diligence, but don't get your hopes up: even a well crafted, precise request can still be thwarted by the institution making the response time ludicrously long. Here's a "successful" FOIL request example, and example response.

# THE FOIL REQUEST

Dear Rich Winters:

Under the provisions of the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request records or portions thereof pertaining to the following New Paltz contracts: number OC42022 and number C991285. I am most interested in records of the locations on campus where the commodities in contract number OC42022 and the APOGEE system in C991285 are being installed. Attached for your convenience are the office of the state comptroller public record details of both of these contracts. If my request appears to be extensive or fails to reasonably describe the records, please contact me in writing or by phone at [REDACTED] or at this email, [REDACTED]

If there are any fees for copying the records requested, please inform me before filling the request (or: . . . please supply the records without informing me if the fees are not in excess of \$10).

As you know, the Freedom of Information Law requires that an agency respond to a request within five business days of receipt of a request. Therefore, I would appreciate a response as soon as possible and look forward to hearing from you shortly.

If for any reason any portion of my request is denied, please inform me of the reasons for the denial in writing and provide the name and address of the person or body to whom an appeal should be directed.

Sincerely,

[REDACTED]



Richard Winters, c. 2008

# THE RESPONSE

RE: FOIL Request #F24 - 009

Dear [REDACTED]

*(I am responding on behalf of Richard Winters, Records Access Officer.)* Our office is in receipt of your FOIL Request received on March 7, 2024 (attached and below). We are in the process of locating and reviewing these records.

Please note that our office will need three months to respond to your request. The additional time needed is due to the scope of records that have to be accessed and reviewed to ensure compliance with all relevant state and federal laws before disclosure, coupled with present work load demands. We will send you a subsequent reply within the outlined time-frame.

Thank you.

Sincerely,

Lisa A. Davis

# BEST PRACTICES:

Keep a research log with names, dates and notes. If you make any calls, write down the name of the person you spoke to, notes on the content of the call, and the date and time. Never assume you will remember! Here's a sample research log.

██████ epic research. Journey log

Jan 31 - calls to purchasing dept. michael walton, budget office. Directed to foil.

Feb 7 - Foil filed. Brosa called.

Feb 8 - controllers office data downloaded. research begins on contracts.  
↳ investigate database cross-checked, who profits. data downloaded. checked against controllers office - sad. signature. search data. servers, microsoft/HP contracts located.

Feb 9 - Foil denied.

Feb 13 - ██████ meeting. Lexisnexis recommended.

Feb 14 - ██████ meeting.

Feb 19 - charitable donations + investments research begins. IBM donation located. 1,933,475 in corporate bonds in 2021 located.

# WHAT WE STILL DON'T KNOW

Where on campus are the Siemens security devices and energy managements systems being installed?

What is the value of SUNY's IBM contracts? What products and services are these contracts for?

What BDS targets does SUNY have shares and investments in? What BDS targets does New Paltz have shares and investments in via the New Paltz Foundation?

What BDS targets does SUNY recieve charitable donations from? What BDS targets does New Paltz receive charitable donations from via the New Paltz Foundation?

What other BDS targets does SUNY do business with?

Annual Investment Allocation Statement  
December 31, 2022

Investment Manager..... Wilmington Trust

Value of Invested Assets as of 12/31/22..... **\$30,626,248**

Asset Mix:

Stocks..... 60.64%  
Bonds..... 29.84%  
Real Assets..... 1.94%  
Hedge Funds..... 2.09%  
Cash Equivalents..... 5.50%

Where is this money being invested?

Portfolio Holdings:

Description	Portfolio Weight
<b>Total Equity</b>	<b>60.64%</b>
<u>Equity – US:</u>	
Stocks, Mutual Funds & ETFs	27.52%
Fossil Fuel Free Parament Stocks	15.88%
<u>Equity International:</u>	
Stocks, Mutual Funds & ETFs	16.56%
Fossil Fuel Free Parament Stocks	0.67%
<b>Total Bonds</b>	<b>29.84%</b>
<u>Fixed Income – US:</u>	
Bonds	12.53%
Fossil Fuel Free Bonds	16.94%
<u>Fixed Income – International</u>	
Bonds	0.00%
Fossil Fuel Free Bonds	0.37%

2022 New Paltz Foundation financial report